

# **EXHIBIT F**



June 3, 2022

***VIA E-MAIL***

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**Re: TQ Delta, LLC v. Nokia Corp., Nokia Solutions and Networks Oy, and Nokia of America Corp.; Nokia of America Corp. v. Broadcom Corp., Broadcom Inc., and Avago Technologies International Sales PTE Ltd.  
Case No. 2:21-cv-0309-JRG (E.D. Texas) (Member Case)**

Mr. Stevens:

I am writing in response to your May 4, 2022, letter and the Interrogatories served the same day. As you are aware, in accordance with the Federal Rules of Civil Procedure 26(d), discovery does not commence until "the parties have conferred as required by Rule 26(f)." Furthermore, in accordance with the terms of Footnote 1 of the Court's Order (Dkt. 27), "[t]imely submission of the parties' proposed docket control order, proposed discovery order and proposed protective order will be viewed by the Court as complying with the conference requirement of Rule 26(f)." Thus, as the parties are still negotiating the proposed docket control order, proposed discovery order and proposed protective order, Broadcom objects to Nokia's letter and Interrogatories as premature and untimely.

Furthermore, Broadcom reserves all rights and objections with respect to any future discovery served by Nokia, including its objections regarding the proper scope of discovery related to Nokia's deficient third-party Complaint. However, as Broadcom noted in its April 1, 2022, letter, Broadcom will agree to accept service and substantively respond to a duly issued third-party subpoena from the Northern District of California to provide any required discovery in Nokia's underlying case with Plaintiff TQ Delta.

Sincerely,

*s/Kent T. Dallow*

Kent T. Dallow

cc: Daniel Young  
Ken Chang